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VIA ECF

January 8, 2008

Honorable Thomas P. Griesa, USDJ
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1630
New York, New York 10007

Re: Bank of Communications v. Ocean Development America, Inc.,
Honming Li a/k/a Michael Li and Xiaoming Zhang
Index No. 07-CV-4628

Dear Judge Griesa:

We are the attorneys for Bank of Communications, the Plaintiff in the above-captioned action. For your Honor's reference, please be advised as follows:

On June 1, 2007 Plaintiffs commenced this action by filing the Summons and Complaint. On June 21 and 22, 2007 defendants were served, and the time for defendants to answer or otherwise appear expired on July 22, 2007, thirty days after service of the Summons and Complaint.

On August 13, 2007, your Honor's clerk, Natalie, informed us that Defendants, after being served, wrote letters directly to the Court (and did not send us copies). She forwarded the letters to us and instructed us to respond to Defendants directly. After sending our response letter to Defendants per the Court's instruction, on August 14, 2007, neither we, nor our client, nor the Court, had received any correspondence or contact from Defendants.

On September 13, 2007 Natalie informed us that Court had receive no response or further correspondence, or any Answer from Defendants, and that she would advise when we were permitted to file our Motion for Default Judgment.

On October 9, 2007 we spoke with your Honor's clerk, John Beale, who had advised that due to the situation and Defendants' actions and as neither we nor the Court had received any response or further communications from Defendants, instead of scheduling an initial conference, that the Court would permit us to file our Motion for Default Judgment, which we filed and served.

Most recently, in the last week of December, 2007, Mr. Beale called and explained that the Defendants have, upon receiving our Motion for Default Judgment, again written letters to the Court (which, as they have done in the past, did not send copies to us). Mr. Beale advised us that your Honor would like to hold a telephonic initial conference rather than just enter the default, in light of the letters from Defendants, and instructed us to contact Defendants directly at the phone number Defendants provided to the Court to schedule the conference.

Although we made several (over 10) calls to Defendants and left voicemail messages each time we called, to date, we have received no response. We informed Mr. Beale of the situation and he informed us that he would speak to your Honor and advise us how to proceed.

We understand that the Court, as a matter of policy, usually does not grant a default when it appears that Defendants are trying to make an effort to participate in the action. However, in this matter, and by Defendants' actions in the previous New York Supreme Court case, it is clear that Defendants are merely trying to avoid enforcement of the New York Supreme Court Judgment in the amount of \$4,874,210.58 entered on August 14, 2006, or avoid entry of a Default Judgment in the current action, but have no intention to participate in this or any other action.

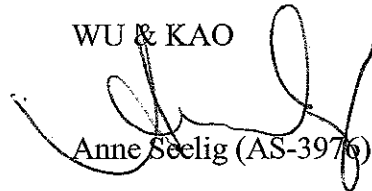
Defendants have wilfully and fraudulently transferred the title of the premises belonging to Ocean Development America, Inc. to themselves as individuals to avoid enforcement of the prior Judgment. In the subject action, Defendants have wilfully attempted to avoid service by changing the office of Ocean Development America, Inc.'s registered agent in California several times, have sent letters to the Court without providing copies to our firm, and have not returned any of our calls regarding scheduling the initial conference.

In view of the foregoing, we respectfully request your Honor's kind understanding of our client's situation to possibly expedite the entry of a default judgment, or some alternative action to sustain a response from Defendants.

Thank you.

Very truly yours,

WU & KAO

A handwritten signature in black ink, appearing to read "Anne Seelig", is written over the typed name.

Anne Seelig (AS-3976)

AS

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